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Nos. 02-00-934

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### STATEMENT OF CHARGES,

## SETTLEMENT AGREEMENT and FINAL ORDER (combined)

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Pyotr Plotnik, M.D., (Respondent), on <u>June</u>, 2001, and pursuant to Iowa Code sections 17A.10(2) and 272C.3(4), file this combined Statement of Charges, Settlement Agreement and Final Order.

#### STATEMENT OF CHARGES

- 1. Respondent was issued license number 24512 to practice medicine and surgery in Iowa on August 27, 1984.
- 2. Respondent's Iowa medical license is Current and next expires on February 1, 2002.
- 3. The Board has jurisdiction in this matter pursuant to Iowa Code Chapters 147, 148 and 272C.

#### **COUNT I**

4. Respondent is charged under section 148.6(2)(d) of the 2001 Code of Iowa with being disciplined by the medical licensing authority of another state.

#### **CIRCUMSTANCES**

- 5. In October 1998, the New York State Board for Professional Medical Conduct filed a Statement of Charges alleging Respondent was guilty of at least thirty-three (33) acts of professional incompetence in the treatment of seven (7) patients between January 1994 and April 1995.
- 6. On or about October 28, 1998, the New York State Board for Professional Medical Conduct and Respondent entered into a Consent Order prohibiting Respondent from performing any and all clinical practice, including treating, examining, diagnosing, evaluating, prescribing or operating upon any person.
- 7. Respondent failed to notify this Board regarding the disciplinary action taken against his New York medical license.

#### SETTLEMENT AGREEMENT

- 8. Respondent admits the allegations contained in the Statement of Charges.
- 9. Immediately upon the Board's approval of this combined Statement of Charges, Settlement Agreement and Final Order, Respondent voluntarily surrenders his Iowa medical license.
- 10. This combined Statement of Charges, Settlement Agreement and Final Order constitutes the resolution of a contested case proceeding.

- 11. By entering into this combined Statement of Charges, Settlement Agreement and Final Order, the Respondent voluntarily waives any rights to a contested case hearing on the allegations contained in the Statement of Charges, and waives any objections to the terms of this Settlement Agreement.
- 12. This combined Statement of Charges, Settlement Agreement and Final Order, is voluntarily submitted by Respondent to the Board for consideration.
- 13. This combined Statement of Charges, Settlement Agreement and Final Order, is subject to approval of the Board. If the Board fails to approve this combined Statement of Charges, Settlement Agreement and Final Order, it shall be of no force or effect to either party.
- 14. The Board's approval of this Statement of Charges and Settlement agreement shall constitute a **FINAL ORDER** of the Board.

Pyotr Plotnik, M.D., Respondent

Subscribed and sworn to before me on \_

Notary Public, State of New YORK

GEORGE FARKAS
Notary Public, State of New York
No. 24 - 4626280

Qualified in Kings County
Commission Expires 20, 2002

This combined Statement of Charges, Settlement Agreement and Final Order is approved by

the Board on June 28, 2001.

Dale R. Holdiman, M.D., Chairperson Iowa Board of Medical Examiners

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